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REMARKS

Applicants respectfully request reconsideration of the present application in view of the reasons which follow.

A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

Claims 1-20 are pending in this application. Claims 1-20 stand rejected. No claims have been amended. Applicants respectfully traverse the Examiner's rejection.

In paragraph 2 of the Office Action, claims 1, 3, 5-8, 10, 12-15, 17, 19 and 20 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,151,001 to Anderson ("Anderson"). Applicants reserve the right to antedate Anderson, if necessary. The Examiner states:

Anderson et al. teaches . . . providing the drive signals to the matrix to thereby energize the corresponding plasma display elements of the matrix in order to display the image on the matrix . . . altering the pixels such that the driver signals are altered to move the imaging 1 [sic] the matrix in a manner which is undetectable by viewers.

Applicants respectfully traverse the Examiner's rejection.

Anderson, as cited by the Examiner, describes the mixing of patterns. Anderson states that "patterns, one of mostly on cells and one of mostly off, which when sequentially updated appear to move in space--the eye can follow the diagonal bars. In FIG. 6b the patterns are 'mixed up' in space by reversing three space bits. In FIG. 6c the mixing is more complex utilizing exclusive OR in conjunction with reversing. In this way it is arranged so that there is no pattern for the eye to follow." (Anderson, col. 5, line 67 to col. 6, line 7). Mixing patterns does not result in a static image.

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In contrast, claims 1, 8 and 15 recite substantially continuously moving the static image on the matrix in a manner which is substantially undetectable to viewers of the display device. Anderson does not describe moving a static image on a matrix. The patterns described by Anderson are "pulsing patterns of a digital image . . . having unexpected patterns or moving portions" and not static images. (Anderson, col. 3, lines 7-8). Indeed, pulsing patterns are the exact opposite of static images. Further, the random pixel changes suggested by Anderson would be ascertainable on a static image. (Anderson, col. 5, lines 54-65) Accordingly, Anderson does not show every element of Claims 1, 8 and 15. Reconsideration and withdrawal of the rejection of claims 1, 8 and 15 is respectfully requested.

Claims 3 and 5-7 depend from claim 1 and include all of the limitations thereof. Claims 10 and 12-14 depend from claim 8 and include all of the limitations thereof. Accordingly, these claims are allowable for at least the reasons described above with reference to claims 1, 8 and 15. Reconsideration and withdrawal of the rejection of claims 3, 5-7, 10 and 12-14 is respectfully requested.

In paragraphs 3-4 of the Office Action, claims 2, 4, 9, 11, 16 and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Anderson in view of U.S. Patent No. 5,790,096 ("Hill"). The Examiner states:

Anderson teaches all the claim limitation of claims 1, 8, 15, except for 'the driver signals to a matrix of light emitting diodes in field effect display device.' However, Hill teaches a related microprocessor of a flat panel data interface module plug-in that may be used. . . . It would have been obvious to a person of ordinary skill in the art at the time of the invention to utilize the electroluminescent in field emissive display taught by Hill . . .

Applicants respectfully traverse the rejection.

As stated above, Anderson does not show substantially continuously moving the static image on the matrix in a manner which is substantially undetectable to viewers of the display device. Anderson also does not teach or suggest substantially continuously moving the static

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image on the matrix in a manner which is substantially undetectable to viewers of the display device. Hill fails to correct the deficiencies noted above with reference to Anderson.

Various dependent claims recite features which are not shown, described or suggested in the cited art. For example, dependent claims 5-7, 12-14 and 19-20 recite features related to an origin of a static image. The Examiner has cited col. 6 in Anderson to provide recitation of an origin of a static image. However, there is no mention of a static image, much less an origin for such an image. Accordingly, an origin for a static image is not shown, described or suggested in Anderson. Hill suffers from the same deficiency. Accordingly, dependent claims 5-7, 12-14 and 19-20 are patentable over the cited art.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 18-1722. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit

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Account No. 18-1722. If any extensions of time are needed for timely acceptance of papers submitted herewith, applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 18-1722.

Respectfully submitted,

Date December 19, 2003

By



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